

## 3.2 STATE AGENCIES

STATE OF CALIFORNIA—THE RESOURCES AGENCY

EDMUND G. BROWN


**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

13760 Lincoln Way  
AUBURN, CA 95603  
(530) 889-0111  
Website: [www.fire.ca.gov](http://www.fire.ca.gov)



SA1

November 1, 2015

TO: Crystal Jacobsen  
Placer County Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

RE: Martis Valley West Specific Plan Project SCH# 2014032087

This project will require a Timberland Conversion and Timber Harvest Plan prior to development as per the following:

*California Code of Regulations, per section 1103, and Public Resources Code 4581 requires a Timberland Conversion Permit and/or Timber Harvest Plan be filed with the California Department of Forestry and Fire Protection if the project involves the removal of a crop of trees of commercial species (regardless of size of trees or if trees are commercially harvested).*

**The Timberland Conversion Permit shall address the following:**

- a. The decrease in timber base in the county as a result of the project.
- b. The cover type, including commercial species, density, age, and size composition affected by the project.
- c. The ground slopes and aspects of the area affected by the project.
- d. The soil types affected by the project.
- e. Any significant problems that may affect the conversion.

California Public Resources Code 4290 and 4291 specifications must be met as well.

If you require further clarification, please contact Forester Jeff Dowling at (530) 587-8926.

Sincerely,

George Morris III

Unit Chief

Jeff Dowling  
Truckee Area Forester

SA1-1

jd

CONSERVATION IS WISE-KEEP CALIFORNIA GREEN AND GOLDEN

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**SA1**

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**California Department of Forestry and Fire Protection**  
**George Morris, Unit Chief**  
**November 1, 2015**

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**SA1-1**

The comment explains that a Timberland Conversion Permit and/or Timber Harvest Plan will be required to be filed with California Department of Forestry and Fire Protection (CAL FIRE) if the project involves the removal of a crop of trees of commercial species. Table 3-7 in Chapter 3, "Project Description," of the DEIR lists the potential permits and approvals required for project implementation, including a Timber Harvest Plan and Timber Conversion Permit through CAL FIRE. As stated in Chapter 3, as development of the West Parcel occurs, individual project applications would be reviewed by the County to determine consistency with the MVWPSP and other regulatory documents and guidelines. Pages 5-10 and 5-11 of the Draft EIR discuss the California Timberland Productivity Act and the procedures related to an immediate rezoning of Timberland Production Zone (TPZ) lands (Sections 51130-51146). Immediate rezoning (as opposed to elapse of the 10-year period to which TPZ lands are committed to timber harvesting activities) requires public notice, a hearing, and a four-fifths vote of the full body of the County Board of Supervisors to tentatively approve the rezoning. The DEIR acknowledges that the immediate rezone of the West Parcel from TPZ to SPL-MVWPSP would require a Timber Conversion Plan, subject to approval by the County Board of Supervisors and California Board of Forestry (through CAL FIRE). The Board's tentative approval accompanied by specific written findings would then be forwarded to the State Board of Forestry and Fire Protection for consideration and approval pursuant to Section 4621.2 of the Public Resources Code. Upon final approval of conversion, the State Board of Forestry and Fire Protection would notify the Board of the approval, and the Board would remove the parcel from TPZ and specify new zoning.

The findings to support an immediate rezoning of TPZ lands are not required to be part of the EIR. Rather, the County Board of Supervisors will make the necessary findings to support immediate rezoning of TPZ lands based on the MVWPSP EIR, after certification of the EIR. The TPZ findings are similar to the Board's decision related to the General Plan consistency: the EIR analysis identifies consistencies and/or inconsistencies, but the ultimate determination of consistency rests with the legislative body.

The comment also states that California Public Resources Code 4290 and 4291 specifications must be met. Sections 4290 and 4291 are discussed in the DEIR project description, starting on page 3-30 under the "Fire and Life Safety" portion of the "Public Services" discussion and under Impact 18-4 (Expose people or structures to wildland fire hazards) in Chapter 18, "Hazards and Hazardous Materials," in the DEIR. Please also see Master Response 9 of this Final EIR addressing wildland fire hazards and emergency plans.

**From:** YOUNT, KEVIN J@DOT [<mailto:KEVIN.YOUNT@dot.ca.gov>]  
**Sent:** Monday, December 14, 2015 3:16 PM  
**To:** Stacy Wydra  
**Subject:** 032015PLA0219 - Martis Valley West Parcel Specific Plan

SA2

Dear Ms. Wydra:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Martis Valley West Parcel Specific Plan Project. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

The proposed project consists of a Specific Plan for 7,212 acres; the Specific Plan area consists of the East and West Parcels. The West Parcel is adjacent to the Northstar Resort, west of SR 267. The East Parcel is located east of SR 267; 670 acres of which are currently zoned residential and commercial. The project would shift 760 units and 6.6 acres of commercial from the East Parcel to 662 acres of the West Parcel. The remaining 390 acres on the West Parcel would remain designated Forest. The 670 acres of the East Parcel currently zoned for development would be redesignated Forest and no development would occur on the East Parcel. The comments below are based on the Notice of Preparation (NOP).

#### ***Traffic Operations***

The Draft EIR mentions that with a Transportation Management Plan, construction traffic would be mitigated. Based on the construction traffic volumes presented for phase 1 of construction, permanent full frontage (Hwy 267) improvements would be warranted. It should be included in the Draft EIR that the left and right turn lanes on the highway be constructed as mitigation for construction traffic.

The Draft EIR does not mention utility routes/easements. Caltrans plans to extend the existing truck climbing lane located to the south. If alternate off-highway routes for utilities are not possible, utility owners need to be willing to move the facilities within our right of way at their costs when Caltrans needs to widen. It's possible this type of language can be handled with the encroachment permit for those facilities.

#### ***Hydraulics***

The western side of this ridge of mountains slopes down to Martis Creek. Martis Creek passes beneath Pla-267 via a double reinforced concrete box (RCB) culvert at PM 2.038 (Bridge No. 19-133) located in the Martis Creek Valley basin near the Truckee Airport. The Martis Creek Valley basin is quite flat and water backs up to the Pla-267 from Martis Creek Lake during peak storm events.

The northeastern (NE) sides of this ridge of mountains slope toward Middle Martis Creek which flows to the NW along the southbound shoulder of Pla-267 from PM 6.20 where it crosses beneath the highway just SE of Martis Peak Road to PM 4.43 where Middle Martis Creek passes back beneath the highway through an existing 48" CMP. Farther downstream to the NW, Middle Martis Creek again passes beneath the highway at a third location (PM 2.93) just SE of Sawmill Flat Road (North Star maintenance road). This crossing is the site of repeated flooding and damage to the private driveway located adjacent to this crossing on the upstream side of the highway. All of these culverts have limited flow capacity and any increase in surface water runoff discharge to Middle Martis Creek could result in significant adverse impacts to the highway or to adjacent properties resulting from increased flooding.

The southern side of this range of mountains slopes to the SE toward Pla-28 and to Lake Tahoe. Runoff enters two small tributary streams that discharge directly to Lake Tahoe. The western most stream is Carnelian Canyon Creek. This creek splits and passes beneath Pla-28 in the community of Carnelian Bay

SA2-1

SA2-2

SA2-3

at two separate location (PM 5.88 to 6.03) which discharge to Lake Tahoe just downstream of the highway.

The eastern stream is Snow Creek. This creek passes beneath Pla-28 just east of Agatam Avenue - East (PM 8.81) and discharges to Lake Tahoe just downstream of the highway.

Any cumulative impacts to Caltrans drainage facilities, bridges, other State facilities or adjacent public or private properties arising from effects of the Martis Valley West Parcel Specific Plan development on surface water runoff discharge should be minimized through project drainage mitigation measures.

**Mitigation Measure 15-5B: Reduce runoff to pre-project conditions** [page 2-72 of the DEIR] indicates that post-project storm water runoff from the project site would be reduced to pre-project conditions through the installation of retention/detention facilities in accordance with the requirements of the Placer County Stormwater Management Manual. However, the text goes on to state that the requirement for the installation of these retention/detention facilities may be deleted (waived) and the "... project may be subject to payment of in-lieu fees ..." as a substitute for retention/detention.

The substitution of these in-lieu fees in place of retention/detention facilities which would reduce runoff discharges, that eventually pass into the State's highway right of way and pass beneath the highway through Caltrans drainage facilities, to pre-construction levels is not acceptable to the State/Caltrans.

Regardless of how far removed the project site is from the State's highway right of way, the project proponents remain responsible for proper mitigation of runoff discharges that eventually reach the State's highway right of way. Failure to properly mitigate any increases in runoff discharge would be a violation of California Streets and Highways Code, Sections 725 and 730.

The State (Caltrans) requires the following for surface water runoff that enters the State's highway right of way and passes through Caltrans drainage facilities:

- No net increase to 100-year storm event peak discharge may be realized within the State's highway right of way and/or Caltrans drainage facilities as a result of the project. Further, the developer must maintain, or improve existing drainage patterns and/or facilities affected by the proposed project to the satisfaction of the State and Caltrans. This may be accomplished through the implementation of stormwater management Best Management Practices (BMPs) (i.e., detention/retention ponds or basins, sub-surface galleries, on-site storage and/or infiltration ditches, etc.) as applicable. Once installed, the property owner must properly maintain these systems. The proponent/developer may be held liable for future damages due to impacts for which adequate mitigation was not undertaken or sustained.
- Runoff from the proposed project that will enter the State's highway right of way and/or Caltrans drainage facilities must meet all Lahontan Regional Water Quality Control Board water quality standards prior to entering the State's highway right of way or Caltrans drainage facilities. Appropriate stormwater quality BMPs (i.e., oil/water separators, clarifiers, infiltration systems, etc.) may be applied to ensure that runoff from the site meets these standards (i.e., is free of oils, greases, metals, sands, sediment, etc.). Once installed, the property owner must properly maintain these systems.
- No detailed drainage plans, drawings or calculations, hydrologic/hydraulic study or report, or plans showing the "pre-construction" and "post-construction" coverage quantities for buildings, streets, parking, etc. were received with the Draft EIR package. In order to adequately evaluate project impacts upon the State's right of way and Caltrans drainage facilities, we recommend that you request these documents from the project proponent and send them to District 3 Hydraulics Branch for review prior to final project approval.

SA2-3  
cont.

SA2-4

- Any work performed within the State's highway R/W must meet all Caltrans design and construction standards and will require a Caltrans' Encroachment Permit.

SA2-4  
cont.***Encroachment Permit***

Any work proposed and performed within the State's highway Right-of-Way (ROW) must be in accordance with Caltrans standards and will require a Caltrans Encroachment Permit prior to commencing construction. To apply for an encroachment permit, a completed encroachment permit application, environmental documentation, and five sets of plans clearly indicating State Right of Way must be submitted to the following address:

Office of Permits  
Caltrans District 3  
703 B Street  
Marysville, CA 95901

SA2-5

Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See the website at the following URL for more information:  
<http://www.dot.ca.gov/hq/traffops/developserv/permits/>

Please provide our office with copies of any further actions or changes to this project.

Please reply to this email to confirm receipt of these comments.

If you should have any questions concerning these comments or require additional information, please feel free to contact me.

SA2-6

Thank you,

KEVIN YOUNT  
TRANSPORTATION PLANNER  
CALTRANS - DISTRICT 3  
DIVISION OF PLANNING & LOCAL ASSISTANCE  
703 B STREET  
MARYSVILLE, CA 95901  
PHONE: (530)741-4286  
EMAIL: [KEVIN.YOUNT@DOT.CA.GOV](mailto:KEVIN.YOUNT@DOT.CA.GOV)

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**SA2**

California Department of Transportation  
Kevin Yount, Transportation Planner  
December 14, 2015

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**SA2-1**

The comment asserts that right and left turn lanes on SR 267 should be constructed as mitigation for construction traffic. In the evaluation of the construction traffic, it is estimated that based on the amount of construction vehicle trips in Phase 1 and the project trip distribution, 138 vehicles would make the southbound right-turn and 74 vehicles would make the northbound left-turn from SR 267 into the project site during the AM peak hour. Respectively, 138 vehicles would make the eastbound left-turn and 74 vehicles would make the eastbound right-turn out of the project site onto SR 267 during the PM peak hour. The project proposes to build the SR 267 intersection to its ultimate configuration when the primary access is constructed, which would occur before the project site is occupied. Therefore, these construction trips would be accommodated by the newly configured intersection.

**SA2-2**

The comment states that utility owners would need to be willing to move facilities within California Department of Transportation (Caltrans) right-of-way at their cost if alternative off-highway routes for utilities are not possible when Caltrans extends the existing truck climbing lane on SR 267 south of the project. At such time as the Caltrans project is implemented, the project developer would coordinate with utility providers as needed regarding placement or relocation of utility infrastructure.

**SA2-3**

The comment describes drainage conditions and facilities in the vicinity of SR 267 and SR 28 and states that any cumulative impacts on Caltrans drainage facilities, bridges, other state facilities or adjacent public or private properties arising from the proposed project should be minimized through project drainage mitigation measures. The comment also expresses concerns that the mitigation measure in the Draft EIR allows for payment of in-lieu fees rather than construction of drainage facilities.

Several project features and mitigation measures would ensure that peak stormwater discharge does not exceed pre-project levels during the 100-year storm event. Mitigation Measure 15-5b on page 15-27 of the Draft EIR is designed to ensure that the MVWPSP does not result in stormwater runoff that exceeds pre-development conditions through the installation of retention/detention facilities. The payment of in-lieu fees would only occur if Placer County determined that drainage conditions do not warrant installation of retention/detention facilities. Specific Plan Policy PSU-9 also requires that the drainage system be designed so that post-development peak flows do not exceed pre-development peak flows. Project development would be subject to Placer County Improvement Plan and Final Drainage Study reviews and approvals. The final drainage plans and studies must comply with Specific Plan Policy PSU-9 and Mitigation Measure 15-5b and would incorporate best management practices (BMPs) that ensure peak flows generated by the developed sites, and entering Caltrans facilities, are equal to or lesser than pre-development peak flow rates. See also Responses SA2-4 and SA2-5. Mitigation Measure 15-5b is revised to read as follows:

**Mitigation Measure 15-5b: Reduce runoff to pre-project conditions**

The Improvement Plan submittal and final Drainage Report shall provide details showing that stormwater run-off shall be reduced to pre-project conditions through the installation of retention/detention facilities. Retention/detention facilities shall be designed in accordance with the requirements of the Placer County Stormwater Management Manual that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Department (ESD), and shall be shown on the

Improvement Plans. The ESD may, after review of the project final drainage report, delete this requirement if it is determined that drainage conditions do not warrant installation of this type of facility. ~~In the event onsite detention requirements are waived, this project may be subject to payment of any in lieu fees payable before Improvement Plan approval as prescribed by County Ordinance.~~ Maintenance of detention facilities by the homeowner's association, property owner's association, property owner, or entity responsible for project maintenance shall be required. No retention/detention facility construction shall be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.

SA2-4

The comment states that no net increase in 100-year storm event peak discharge would be allowed within the SR 267 right-of-way or Caltrans drainage facilities and that runoff that enters the highway right-of-way and/or Caltrans drainage facilities must meet Lahontan Regional Water Quality Control Board (RWQCB) water quality standards. The comment also states that no detailed drainage plans, drawings or calculations, hydrologic/hydraulic study, or report or plans showing the preconstruction and post-construction conditions were received with the Draft EIR, and suggests that these documents be sent to Caltrans for review prior to final project approval. Finally, the comment states that any work performed within the state highway right-of-way must meet all Caltrans standards and obtain a Caltrans encroachment permit.

See Response SA2-3 for a discussion of net changes in stormwater runoff during the 100-year event. Stormwater quality is addressed in Impact 15-1 (for construction) and 15-2 (for operations) in the Draft EIR. Mitigation Measure 15-1 requires preparation of a stormwater pollution prevention plan (SWPPP) for each construction phase. Lahontan RWQCB has the authority to review the SWPPP and administer the provisions of the NPDES permit, and can step in at any time if enforcement action is needed. Oversight of the SWPPP would be the responsibility of a qualified SWPPP practitioner, who is certified to oversee and implement the SWPPP and make sure that it meets water quality standards. Implementation of Mitigation Measure 15-2a through e, including BMPs and Low Impact Development measures (LIDs), would protect stormwater quality within the project area. With implementation of these measures, runoff from the project area would comply with the County's Municipal Separate Storm Sewer System Permit, and runoff leaving the site would not exceed applicable water quality standards.

As stated on page 15-25 of the Draft EIR, a Preliminary Technical Drainage Report was prepared for the project and was appended to the Draft EIR (Appendix M). Final drainage plans would be submitted to the County with Improvement Plans and to Caltrans with the Encroachment Permit application. A preliminary 100-year floodplain analysis has also been completed at the request of Placer County Engineering and Surveying Division. As required by Mitigation Measures 15-5b and 15-6a through f, final plans would demonstrate that the proposed bridge crossing at the project entrance is outside of the 100-year floodplain and that existing Caltrans facilities are not adversely affected by the proposed project, including demonstration of no increase in post-project flows to Caltrans rights-of-way.

As discussed in Response SA2-5, no project-related work would be conducted within the Caltrans right-of-way until an encroachment permit is obtained from Caltrans. The applicant has submitted preliminary plans to Caltrans for early review, and would formally submit plans as part of the encroachment permit process. As part of the encroachment permit, the project must demonstrate that it meets all Caltrans design and construction standards.

SA2-5

The comment states that any work proposed and performed within the state's highway right-of-way must be in accordance with Caltrans standards and will require a Caltrans encroachment permit prior to commencing construction. A Caltrans encroachment permit is identified in Table 3-7 in Section 3.4.1 of the Draft EIR (page 3-35) as one of the permits or

approvals that may be required for project implementation. The project applicant would coordinate as needed with Caltrans regarding any necessary authorizations.

SA2-6

The comment provides contact information and requests copies of any further actions or changes to the project. The County and project applicant will continue to coordinate with Caltrans as the project proceeds.



**From:** YOUNT, KEVIN J@DOT [<mailto:KEVIN.YOUNT@dot.ca.gov>]  
**Sent:** Tuesday, December 22, 2015 3:30 PM  
**To:** Stacy Wydra  
**Subject:** 032015PLA0219 - Martis Valley West Parcel Specific Plan

SA3

Dear Ms. Wydra:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Martis Valley West Parcel Specific Plan (MVWPSP) Project. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local development for impacts to the State Highway System in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

The proposed project consists of a Specific Plan for 7,212 acres; the Specific Plan area consists of the East and West Parcels. The West Parcel is adjacent to the Northstar Resort, west of SR 267. The East Parcel is located east of SR 267; 670 acres of which are currently zoned residential and commercial. The project would shift 760 units and 6.6 acres of commercial from the East Parcel to 662 acres of the West Parcel. The remaining 390 acres on the West Parcel would remain designated Forest. The 670 acres of the East Parcel currently zoned for development would be redesignated Forest and no development would occur on the East Parcel. The comments below are based on the Draft EIR (DEIR).

Mitigation Measure 10-2 describes future roadway improvements on State Route 267, which includes widening from 2 lanes to 4 lanes. Table 10-14 shows \$13,878,000.00 of state funding for this project. Please provide further discussion concerning the source of these funds and the correlation between this road improvement project and the MVWPSP.

Please provide our office with copies of any further actions or changes to this project.

Please reply to this email to confirm receipt of these comments.

If you should have any questions concerning these comments or require additional information, please feel free to contact me.

Thank you,

KEVIN YOUNT  
TRANSPORTATION PLANNER  
CALTRANS - DISTRICT 3  
DIVISION OF PLANNING & LOCAL ASSISTANCE  
703 B STREET  
MARYSVILLE, CA 95901  
PHONE: (530)741-4286  
EMAIL: [KEVIN.YOUNT@DOT.CA.GOV](mailto:KEVIN.YOUNT@DOT.CA.GOV)

SA3-1

**SA3**

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California Department of Transportation  
Kevin Yount, Transportation Planner  
December 22, 2015

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**SA3-1**

The comment refers to Draft EIR Mitigation Measure 10-2, which describes future roadway improvements on SR 267, including widening from two to four lanes, and Table 10-14, which shows \$13,878,000 of state funding for the roadway improvements. The commenter requests further information on the source of the funds and the correlation between the road improvement and the proposed project. The Transportation Corridor Concept Report (TCCR) for SR 267 identifies facilities and improvements needed to maintain a concept level of service standard. The SR 267 TCCR states that, “in order to meet the Concept LOS, the facility will ultimately need to be widened to four lanes” in relation to Segment 2 – Nevada/Placer County line to Brockway Summit. Placer County included the specified widening in the Tahoe District Capital Improvement Program (CIP) to be consistent with the adopted TCCR. As stated on page 10-31 of the Draft EIR, approximately \$13,878,000 of the estimate cost of this improvement is assumed to come from the State. The SR 267 TCCR states “improvements to the state highway system are the responsibility of both Caltrans and local agencies.” This estimate is consistent with the funding sources listed in the CIP; however, no specific state funding source has been identified by the County. County funding would come from the Countywide Traffic Mitigation Fee Program, into which the project would pay its fair share toward implementation of necessary improvements.

The comment provides contact information and a request for copies of any further actions or changes to the project. The County and project applicant will continue to coordinate with Caltrans as the project proceeds.

### 3.3 REGIONAL AGENCIES



**Mail**  
PO Box 5310  
Stateline, NV 89449-5310

**Location**  
128 Market Street  
Stateline, NV 89449

**Contact**  
Phone: 775-588-5555  
Fax: 775-588-5555  
www.trpa.org

**RA1**

December 22, 2015

Placer County Community Development Resource Agency  
Environmental Coordination Services  
3091 County Center Drive, Suite  
190 Auburn, California 95603

Attn: Shirlee Herrington

[cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

**RE: Draft Environmental Impact Report for the Martis Valley West Parcel Specific Plan  
(California State Clearing House No. 2014032087)**

To Whom It May Concern:

Please accept these comments on behalf of the Tahoe Metropolitan Planning Organization (TMPO), the California Regional Transportation Planning Agency (RTPA) and the Tahoe Regional Planning Agency (TRPA) on the above referenced Draft Environmental Impact Report (DEIR) for the Martis Valley West Parcel Specific Plan (MWSP). The proposed MWSP significantly expands the bedbase and retail near the Northstar Resort. The impacts of this proposed expansion, to be phased in over time, reach and extend into the Tahoe Region, a defined governmental jurisdiction governed by the terms of an approved and federally sanctioned bi-State Compact. The Compact recognizes Lake Tahoe as one of our nation's greatest treasures.

The TMPO, RTPA and TRPA work hand in glove to protect and preserve the outstanding resource values at Lake Tahoe while also providing opportunities for orderly growth and development consistent with specially adopted regional environmental standards called "thresholds." The TMPO's core mission, consistent with the goals of the TRPA and the RTPA, is to establish a safe, efficient and integrated transportation system that reduces reliance on the private automobile, provides for alternative modes of transportation, serves the basic transportation needs of the citizens of the Tahoe Region, supports the economic base of the region in the movement of goods and people, and minimizes adverse impacts on humans and the environment. The State of California delegated to TRPA the responsibility of being the RTPA for the California-side of the Tahoe Basin. As the RTPA, TRPA is charged with developing a Regional Transportation Plan (RTP), a Regional Transportation Improvement Program (RTIP) to program California state funding, and the allocation of California state transportation funding. Under the Bi-State Tahoe Regional Planning Compact, the TRPA plans for and regulates development within the Tahoe Basin that is not only consistent with but also promotes the region's environmental objectives. Recently, the TRPA, TMPO and RTPA adopted the 2012 RTP in order to meet these objectives

RA1-1

*imagine. plan. achieve.*

Placer County Env. Coord. Services  
December 22, 2015  
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and to promote environmental redevelopment within the Tahoe Basin necessary to drive infrastructure improvements to reduce fine sediment and nutrients inflow to Lake Tahoe.

By proposing to increase the bedbase and retail, the MWSP, if implemented without adequate mitigation, would significantly affect Lake Tahoe's physical environment through increased vehicle trips into, and the amount of vehicle miles traveled within, the Tahoe Basin. The TMPO, RTPA and TRPA therefore focus these comments on the Chapter 10 of the DEIR, "Transportation and Circulation." Chapter 10 of the MWSP DEIR contains estimates of vehicle trips generated by the proposed MWSP.<sup>1</sup> From this data, TRPA computed 1,394 daily in-basin trips and a range of daily in-basin VMT of 16,235 to 21,311.<sup>2</sup> These trips and VMT add to the cumulative impacts from other projects also under consideration by Placer County such as the Village at Squaw Valley Specific Plan and the Brockway Campground as well as from projects previously approved (e.g. Homewood Mountain Resort).

RA1-1  
cont.

Both vehicle trips and vehicle miles traveled are considered standards of significance for projects within the Tahoe Basin. The first standard is the region's vehicle miles traveled (VMT) threshold. The proposed project could increase in-basin VMT by 0.2-1%, contributing, along with other projects to exceedance of the TRPA's VMT threshold. As part of the Regional Plan Update in 2012, TRPA established a mitigation measure for exceedance of the VMT threshold. This mitigation measure limits in-basin development, however, it applies only within the Tahoe Basin. The second standard of significance is related to vehicle trips. Applicants for in-basin projects that would result in a significant increase in daily vehicle trips must prepare and submit to TRPA a technically adequate analysis of potential traffic and air quality impacts (TRPA Code Section 65.2.4.B). A "significant increase" is defined as more than 200 daily vehicle trips (TRPA Code Section 65.2.3.G). Based on this analysis, projects are required to mitigate all traffic and air quality impacts to a level consistent with the environmental thresholds, the Goals and Policies, the Regional Transportation Plan, and the 1992 Air Quality Plan (65.2.4.B.6). In addition, all new projects, not only those that generate more than 200 daily vehicle trips, must offset their impacts by paying an air quality mitigation fee per new daily vehicle trip end (TRPA Code Section 65.2.5.C).

RA1-2

Our respective staffs have engaged in productive discussion on how to address these Lake Tahoe Region impacts (referred to herein as "in-basin" impacts). We greatly appreciate the cooperation and collaboration with Placer County and the time and attention expended to explain proposed mitigation and other mechanisms that could be applied to address the in-basin impacts. Our discussions have focused on two measures, traffic impact fees to implement

<sup>1</sup> For the purposes of these comments, TRPA accepts at face value the information in the DEIR it used to estimate daily trips. TRPA has reviewed and has no comments on other DEIR chapters.

<sup>2</sup> The range in VMT results from different methodological approaches to estimating trip length. The difference, however, becomes irrelevant with mitigation adequate to offset new trips.

Placer County Env. Coord. Services  
December 22, 2015  
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transportation and transit capital improvement programs (CIP) and formation of zones of benefit under Placer County's County Service Area 28 to provide ongoing transit funding.

Opportunities exist to clarify Placer County's process and allocation of resources under these two mechanisms. First, there are opportunities to identify those CIP elements that would result in improvements in transit service needed (e.g., bus acquisition) to reduce trips in the Tahoe Basin by individual automobiles (as opposed to measures solely to improve level of service (LOS) criteria, e.g. roadway expansions). Second, opportunities exist to set up ongoing operational funding streams in amounts necessary for added transit service to offset the increase in in-basin trips generated by the MWSP. For example, new trips resulting from the MWSP could be addressed via increased transit runs on the resort triangle loop. Adding another run would accommodate the approximately 500 of the new trips that are anticipated to come from the Martis West development per day to Kings Beach. Providing these additional new transit runs would cost approximately \$220,000 annually. Equally important, however, is ensuring that visitors are incentivized to use the new transit so that the investment in transit capital and operations results in actual trip reduction. Potential options for incentivizing transit use could include free transit fares, an origin-based parking charge for visitors who bring their cars (which could have the added benefit of reducing the need for parking spaces), or destination-based parking charges within the Tahoe Basin.

RA1-2  
cont.

Applying these or other adequate mitigation measures to offset predicted increases in trips and VMT confers many benefits across the region. Demonstrating the mitigation of new, in-basin vehicle trips by the DEIR will also assist the TMPO to achieve per capita greenhouse gas emission reduction targets mandated by California's Senate Bill 375, the Sustainable Communities and Climate Protection Act of 2008. In accordance with this bill, the TMPO maintains and works with transportation service providers to implement a Sustainable Communities Strategy (SCS), a plan currently being updated as the 2016 Regional Transportation Plan. The SCS must show how the Region will meet mandated per capita greenhouse gas emissions reductions. The approved and validated 2012 SCS meets the current targets for the Lake Tahoe Region, a 7% per capita reduction by 2020 and a 5% per capita reduction by 2035 (as compared to the 2005 base year). More recently, new greenhouse gas emission reduction targets have been articulated by California Governor Jerry Brown in his Executive Order B-30-15. These new more stringent targets, anticipated to be adopted by the California Air Resources Board, would require reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. Total basin-wide greenhouse gas emissions are divided by the region's resident population to form the "per capita" estimate. As population growth in the Tahoe Region is limited by policies and regulations in the Lake Tahoe Regional Plan, any growth in greenhouse gas emissions must be borne by this relatively static population. Growth in visitor trips, such as the potential impacts from MWSP, contributes to growth in per capita greenhouse gas emissions. Use of the funding mechanisms suggested in these comments on the MWSP DEIS to create a robust transit system and increase transit services allows near basin growth and in-basin impacts to be off set.

RA1-3

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On the other hand, the absence of such transit services threatens not only the progress of greenhouse gas reduction programs, but also one of the strategies for achieving Lake Tahoe's water quality thresholds. In the 2012 Regional Plan Update, TRPA recognized the critical need to redevelop aging infrastructure with new, environmentally beneficial development. The environmental redevelopment of places like Tahoe City and Kings Beach results in substantial reductions of fine sediment and nutrient deposition, the pollutants degrading Lake Tahoe's famed clarity and blueness. The environmentally beneficial redevelopment relied upon by TRPA may be threatened by unmitigated out-of-basin increases in trips and VMT. As a result of VMT capacity used elsewhere, efforts to protect Lake Tahoe may suffer without the ability to approve in-basin redevelopment.

RA1-3  
cont.

Placer County's operation of the two transit funding mechanisms as discussed above provides the avenue to avoid such consequences. Through the provision of adequate transit facilities and operations, the trips and VMT generated by development in the region may be off set. We look forward to continuing the cooperative work to implement world-class transit in Placer County.

If you have any questions, please contact me at (775) 303-4882 or jmarshall@trpa.org.

Sincerely,



John L. Marshall  
General Counsel

cc: Joanne Marchetta, TRPA  
Karin Schwab, Placer County

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**RA1**

Tahoe Regional Planning Agency  
John Marshall, General Counsel  
December 22, 2015

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- RA1-1 The comment provides an introductory statement related to the jurisdiction and responsibilities of TRPA and the Tahoe Metropolitan Planning Organization (TMPO) and expresses concerns regarding project-related impacts that would extend into the Lake Tahoe Basin. The comment focuses on potential effects to Lake Tahoe's physical environment through increased vehicle trips into, and the amount of vehicle miles traveled (VMT) within, the Tahoe Basin. The comment reports calculated project-generated in-Basin daily trips of 1,394 and daily in-Basin VMT of 16,235 to 21,311. Please see Master Response 6 regarding VMT, including in-Basin VMT.
- RA1-2 The comment describes that vehicle trips and VMT are considered standards of significance for projects in the Tahoe Basin and cites project-generated VMT, in combination with other cumulative development, as contributing to exceedance of TRPA's VMT threshold. The comment acknowledges the cooperation and collaboration between TRPA and Placer County and recommends measures to address in-Basin effects and reduce trips in the Tahoe Basin. Please see Master Response 6 regarding VMT and responses to comments IO41-48 and IO41-49 regarding potential measures to reduce VMT. Please also see response to comment IO32-2 regarding suggested measures to address additional trips between the project site and Northstar. The project proposes to implement a shuttle with construction of the 340<sup>th</sup> unit (see Policy CP-13 of the Specific Plan). The shuttle would travel to local destinations, potentially including destinations to the south of the project site within the Tahoe Basin. The project shuttle could be coordinated with other shuttle and transit service in the project vicinity. The Specific Plan Goal CP-3 includes additional policies aimed at reducing single-occupancy vehicle use (see page 35 of the Specific Plan), such as providing a covered bus shelter/transit stop within the plan area (Policy CP-3), joining and/or partnering with local transit organizations and/or providers to extend service to the MVWPSP (Policy CP-4), and developing an extensive network of pedestrian, cross-country skiing, hiking and bike trails within the MVWPSP (Policy CP-5).
- RA1-3 The comment notes that mitigation of in-Basin trips would assist in achieving regional greenhouse gas emission targets. Please see response to comment SA4-2, Master Response 6 regarding VMT, and Master Response 7 regarding greenhouse gas emissions. Also, as discussed in response to comment IO41-48, Mitigation Measure 10-5a includes the payment of fees and establishment of a new Zone of Benefit or annexation into an existing Zone of Benefit to provide adequate funding of capital improvement programs and ongoing operational transit services.
- Placer County appreciates the TRPA's and TMPO's input regarding VMT, transit, and the proposed MVWPSP. Placer County looks forward to continuing to work cooperatively on regional transportation issues. The comments and recommendations of this letter will be considered by the Placer County Planning Commission and Board of Supervisors during project deliberations.

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